

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

SONIC INDUSTRIES LLC,)
a Delaware limited liability company, and)
SONIC FRANCHISING LLC,)
a Delaware limited liability company,)

Plaintiffs,)

v.)

Case No. 5:24-cv-00474-HE

LET’S SHAKE, L.L.C.,)
a Texas limited liability company,)
SUNIL DHAROD, an individual, and)
LET’S SHAKE ON IT, L.L.C.,)
a Texas limited liability company,)

Defendants.)

**DEFENDANTS’ UNOPPOSED MOTION FOR
EXTENSION OF TIME TO SERVE INITIAL DISCLOSURES**

Defendants Let’s Shake, L.L.C., Sunil Dharod, and Let’s Shake On It, L.L.C. (“Defendants”), by and through undersigned counsel, pursuant to Fed. R. Civ. P. 6 and LCvR 6.3, respectfully move for an extension of the deadline to serve its Rule 26(a)(1) Initial Disclosures (the “Initial Disclosures”), up to and including June 30, 2025, and in support, states as follows:

1. Pursuant to the Scheduling Order entered on June 4, 2025 (Doc. 31), the Initial Disclosures are currently due on June 18, 2025.

2. On May 27, 2025, this Court granted in part Defendants’ Motion to Compel Arbitration (Doc. 27), resulting in Defendants’ counterclaims being stayed in this matter to be pursued through arbitration.

3. Defendants are currently working with Plaintiffs' counsel to determine the appropriate approach for arbitrating Defendants' counterclaims, and to ascertain what impact this will have on Defendants' affirmative defenses in this matter because of the overlapping facts and issues.

4. As a result of these ongoing negotiations, and the work required to initiate arbitration as to Defendants' counterclaims, Defendants require additional time to fully prepare their Initial Disclosures.

4. Defendants' request is made in good faith and is not sought for the purpose of delay.

5. The requested extension is not opposed and will not unduly prejudice the rights of any party involved in this case.

6. Defendants have previously requested (Doc. 7) and received (Doc. 8) an extension of time in which to answer or otherwise respond to the Complaint in this matter. Defendants also requested (Doc. 13) and received (Doc. 14) an extension of time to file their reply to Plaintiffs' Response to Defendants' Motion to Compel Arbitration.

7. The requested extension will not impact any trial or scheduled deadlines in this matter.

8. A proposed order is submitted contemporaneously herewith.

WHEREFORE, Defendants Let's Shake, L.L.C., Sunil Dharod, and Let's Shake on It, L.L.C., respectfully request that the Court grant Defendants an extension of time in which to serve their Initial Disclosures to June 30, 2025.

DOERNER, SAUNDERS, DANIEL &
ANDERSON, L.L.P.

By: /s/ Todd L. Grimmett
D. Benham Kirk, OBA No. 5044
Michael S. Linscott, OBA No. 17266
Todd L. Grimmett, OBA No. 21199
210 Park Avenue, Suite 1200
Oklahoma City, Oklahoma 73102-5603
dbkirk@dsda.com
mlinscott@dsda.com
tgrimmett@dsda.com
Phone: 405.319.3506
Phone: 918.591.5288
Phone: 405.319.3560
Fax: 405.319.3536
Fax: 918.925.5288
Fax: 405.319.3536
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2025, I transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF Registrants:

JOE M. HAMPTON, OBA No. 11851
TOBY M. McKINSTRY, OBA No. 17401
MAGGIE M. LOGAN, OBA No. 3322
TOMLINSON MCKINSTRY, P.C.
Two Leadership Square
211 North Robinson Ave., Suite 450
Oklahoma City, OK 73102
Telephone: (405) 702-4346
Facsimile: (833) 657-0184
joeh@tmoklaw.com
tobym@tmoklaw.com
maggiel@tmoklaw.com

/s/ Todd L. Grimmett
Todd L. Grimmett

8767775.1